

***Hargis v. Pacific Senior Living Management, LLC***  
**Case No. 2:22-cv-06989-MCS-PD**  
**FEE CHART**

<b>Task &amp; Date</b>	<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Fee</b>
10/16/2024 Prepare for and participate in meet and confer with M. Taggart; follow up emails	Skinner	1.90	\$495	\$940.50
10/18/2024 Prepare new discovery dispute email; research case law to support positions in discovery dispute; gather exhibits in support of discovery dispute; circulate discovery dispute email to legal team for review and revisions.	Skinner	5.20	\$495	\$2,574.50
10/21/2024 Finalize proposed discovery dispute email to Judge Donahue	Skinner	3.20	\$495	\$1,584.00
11/18/24 Research re joint stipulation; begin drafting joint stipulation ISO mtn to compel; strategize with legal team re joint stipulation; review discovery to determine scope of RFPs.	Skinner	6.90	\$495	\$3,415.50
11/18/24 Confer with C. Skinner regarding motion to compel hearing and strategy; confer with C. Skinner regarding results of hearing, briefing on ACP claim to fees payment issue, fees motion	Tehranian	0.40	\$795	\$318.00
11/19/24 Draft and finalize joint stipulation re attorneys' fees documents.	Skinner	7.80	\$495	\$3,861.00
11/19/24 Confer with C. Skinner regarding motion to compel joint stipulation; review and analyze same; revise same and draft notes to C. Skinner regarding same	Tehranian	1.10	\$795	\$874.50
11/22/2024 Work on attorneys' fees issue; emails with client; research further case law to use in supplemental brief.	Skinner	2.60	\$495	\$1,287.00
12/5/2024 Outline and research supplemental briefing	Mulvey	1.00	\$495	\$495.00

Task & Date	Attorney	Hours	Rate	Fee
12/6/24 Review T. Mulvey draft of supplemental brief re attorneys' fees; emails with legal team re. same; research on legal issues raised by opposing counsel in their brief; revise draft supplemental brief; circulate updated draft brief to legal team for review and revisions.	Skinner	5.20	\$495	\$2,574.00
12/6/2024 Draft supplemental briefing, correspondence with team re: same	Mulvey	0.80	\$495	\$396.00
12/9/2024 Draft supplemental brief, conference with CS regarding the same	Mulvey	5.40	\$495	\$2,673.00
12/10/2024 Review and revise supplemental briefing	Mulvey	0.40	\$495	\$198.00
12/12/2024 Revise supplement response; draft comments with respect to same; confer with litigation team regarding same; review and analyze case law regarding alter ego pursuits in post-judgment discovery; confer with litigation team regarding same, finalization of brief and filing.	Tehranian	1.50	\$795	\$1,192.50
12/12/2024 Review redlines to supplemental briefing, correspondence with TF re: same.	Mulvey	0.50	\$495	\$247.50
3/17/2025 Review motion to compel order; strategize with legal team re application for attorneys' fees and costs; outline draft application; begin researching substantial justification standard.	Skinner	3.20	\$595	\$1,904.00
3/17/2025 Finalize research on substantial justification standard; research authority on holding counsel liable jointly and severally for sanction.	Skinner	2.30	\$595	\$1,368.50
3/18/2025 Draft application for attorneys' fees and costs.	Skinner	7.20	\$595	\$4,284.00

<b>Task &amp; Date</b>	<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Fee</b>
3/18/2025 review and analyze draft fees brief; revise same; draft notes regarding same; confer with C. Skinner regarding same.	Tehranian	1.10	\$895	\$984.50
3/19/2025 Draft application for attorneys' fees and costs; collect exhibits; draft proposed order; draft notion of motion; draft Skinner and Tehranian Declarations.	Skinner	8.10	\$595	\$4,819.50
3/19/2025 confer with C. Skinner regarding fees motion revisions, billing records and finalization	Tehranian	0.20	\$895	\$179.00